

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHENMING HOLDINGS (HONG KONG)
LIMITED, *a Hong Kong limited company,*

Plaintiff,

– against –

Val Sklarov, Tetyana Sklarov, Jaitegh “JT” Singh,
Jurist IQ Corp, Sierra Universal Corp, UPC
Holdings Ltd, Lviv Estate Holdings Ltd, C
Vanderbilt Management Ltd.,

Defendants.

24 CV 935 (KPF)

Hon. Katherine P. Failla

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED
COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Val Sklarov dated January 4, 2025, and Declaration of Tetyana Vasziliv dated January 4, 2025, and upon all prior papers, pleadings, and proceedings in this action, Defendants Val Sklarov and Tetyana Vasziliv (named in the above-captioned action as “Tetyana Sklarov”) (together, the “Moving Defendants”), by their undersigned attorneys, Cohen & Gresser LLP, will move this Court before the Honorable Katherine P. Failla, at the United States District Court for the Southern District of New York, on a date and time to be determined by the Court or as soon thereafter as counsel can be heard, for an order pursuant to Federal Rules of Civil Procedure 9(b), 12(b)(1), 12(b)(2), and 12(b)(6) granting (i) dismissal of the Second Amended Complaint with prejudice, and (ii) such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to this Court's Order dated October 29, 2024, answering papers, if any, must be served by February 14, 2025, and reply papers, if any, must be served by February 28, 2025.

Dated: January 6, 2025
New York, New York

Respectfully submitted,

COHEN & GRESSER LLP



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